

GILBERT LAW GROUP

**425 BROADHOLLOW ROAD, SUITE 405
MELVILLE, NY 11747-4701
631.630.0100**

BY ELECTRON

Hon. Philip M. Halpern
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601-4150

Application granted. Plaintiff shall file the joint 56.1 statement by June 30, 2025.

The Clerk of Court is respectfully directed to terminate the letter motion pending at Doc. 88.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
June 20, 2025

Re: ***Balchan v. New Rochelle City School District, et al.***
Case No. 7:23-cv-06202 (PMH)

Dear Judge Halpern:

This office represents the plaintiff, Dr. Brooke Balchan (“plaintiff”), in the above-referenced action. This letter shall serve to request an extension in time for the parties to submit their Local Civil Rule 56.1 Statement of Fact (“Statement of Facts”). The parties’ deadline for filing the Statement of Facts is currently June 23, 2025. Your Honor directed the parties to file their joint Statement of Facts within two-weeks after the pre-motion conference, which was held on June 9, 2025. On Monday evening, June 16, 2025, defendants served plaintiff with its 18-page Statement of Facts. I have had a number of professional commitments that were already scheduled which have and will impede my ability to complete the Statement of Facts by June 23. Additionally, I am currently out of state on a family trip which was scheduled long before this deadline was calendared. Accordingly, plaintiff respectfully requests that she be granted a one-week extension to complete and file the parties’ Statement of Facts until on or before June 30, 2025.

This is plaintiff’s first request for an extension in time to file the parties’ Statement of Fact. Defendants have consented to plaintiff’s request. Should plaintiff’s request be granted, the requested extension will not prejudice any party to this action. Given my calendar and number of claims remaining in the instant action, the requested extension represents the minimum amount of time I require to complete the Statement of Fact.

Thank you for Your Honor's ongoing courtesies and consideration of this matter.

Very truly yours,

GILBERT LAW GROUP

A handwritten signature in black ink, appearing to read "Jason Gilbert", written in a cursive style.

JASON ANDREW GILBERT

cc: Michael A. Miranda, Esq. (by ECF)
Richard Brian Epstein, Esq. (by ECF)
Maurizio Savoiaro, Esq. (by ECF)